

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In re:

**Advantage Management Beaver Dam, LLC,

Debtor.**

**Case No. 22-
Chapter 11 Proceedings
(Motion for joint administration
Pending)¹**

In re:

**Advantage Management Waupun, LLC,

Debtor.**

**Case No. 22-
Chapter 11 Proceedings
(Motion for joint administration
Pending)¹**

In re:

**BDW Holdings Beaver Dam, LLC,

Debtor.**

**Case No. 22-
Chapter 11 Proceedings
(Motion for joint administration
Pending)¹**

In re:

**BDW Holdings Waupun, LLC,

Debtor.**

**Case No. 22-
Chapter 11 Proceedings
(Motion for joint administration
Pending)¹**

**EX PARTE MOTION FOR EMERGENCY, EXPEDITED HEARING ON OR BEFORE
APRIL 12, 2022 BY THE DEBTORS ON THEIR (i) MOTIONS FOR APPROVAL OF
USE OF CASH COLLATERAL AND ADEQUATE PROTECTION, WITH REQUEST
FOR PRELIMINARY APPROVAL, (ii) MOTIONS TO PAY PRE-PETITION WAGES
AND (iii) MOTIONS FOR JOINT ADMINISTRATION**

¹ This motion has been filed in each of the cases. At the time this motion was filed, the Court had not granted the motion for joint administration. The caption showing all related debtors is being used to alert parties-in-interest that the identical motion is being filed in each case. The caption should not be construed that Court has approved the joint administration motion

Advantage Management Beaver Dam, LLC (“Management Beaver Dam”), Advantage Management Waupun, LLC (“Management Waupun”), BDW Holdings Beaver Dam, LLC (“Beaver Dam Holdings”) and BDW Holdings Waupun, LLC (“Waupun Holdings”), (collectively, the “Debtors”), each move, **ex parte**, for an expedited hearing **on or before April 12, 2022** on their motions (i) for approval of the use of cash collateral and adequate protection on a preliminary basis, (ii) payment of pre-petition wages and (iii) joint administration (collectively, the “First Day Motions”).

The Debtors request that the Court consider this motion to set the emergency hearings on an **ex parte** basis for the First Day Motions. This motion is procedural only and does not affect substantive rights. It is a standard motion for first day chapter 11 motions.

Support for the reasons to set an emergency hearing on the First Day Motions is set forth in more detail in the First Day Motions and supporting pleadings. Absent expedited relief on the cash collateral and pre-petition wage motions, the Debtors’ will be unable to retain employees or pay vendors post-petition. The Debtors’ operations and ability to reorganize are in jeopardy.

Accordingly, the Debtors request that the Court enter a minute order on the dockets approving and setting an emergency expedited hearing on the First Day Motion at a time convenient to the Court that is on or before **Tuesday, April 12, 2022**. Upon the minute order being entered, the Debtors will provide notice of the First Day Motions.

Dated: April 4, 2022.

/s/ Evan P. Schmit

Jerome R. Kerkman

Evan P. Schmit

Kerkman & Dunn

Proposed Attorneys for the Debtors

P.O. Address:

839 N. Jefferson St., Suite 400
Milwaukee, WI 53202-3744
Phone: 414.277.8200
Facsimile: 414.277.0100
Email: eschmit@kerkmandunn.com